

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	NO. 03-CR-10356-MLW
	)	
FREDERICK A. SIMONE, (1)	)	
a/k/a FREDDY, THE NEIGHBOR;	)	
VINCENT C. GIOACCHINI, (2)	)	
a/k/a DEE DEE; and	)	
FRANCIS WHITE, (3)	)	
a/k/a THE WHITE-HAIRED GUY	)	

JOINT INITIAL STATUS CONFERENCE MEMO

Pursuant to D. Mass. L.R. 116.5(A), the undersigned parties have conferred but are not yet able to address the issues enumerated in L.R. 116.5(A)(1)-(7). Instead, all defendants request an additional 45 days in which to review discovery and submit responsive discovery requests, as necessary. All parties respectfully request that the Court set an Interim Status Conference thereafter. All parties agree that the time period from and including January 14, 2003 through and including the

date of the Interim Status Conference shall be excluded for the purposes of the Speedy Trial Act, 18 U.S.C. 3161(c)(1).

Respectfully submitted,

FREDERICK A. SIMONE  
Defendant

VINCENT C. GIOACCHINI  
Defendant

By: /s/ Kevin Reddington  
\_\_\_\_\_  
(by CO)  
KEVIN J. REDDINGTON, ESQ.  
Counsel for Defendant

By: /s/ Robert George  
\_\_\_\_\_  
(by CO)  
ROBERT A. GEORGE, ESQ.  
Counsel for Defendant

FRANCIS WHITE  
Defendant

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Richard Egbert  
\_\_\_\_\_  
(by CO)  
RICHARD M. EGBERT, ESQ.  
Counsel for Defendant

By: /s/ Colin Owyang  
\_\_\_\_\_  
ERNEST DiNISCO  
COLIN OWYANG  
Assistant U.S. Attorneys

Date: January 13, 2004